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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

ELIZABETH A. STRANGE  
First Assistant United States Attorney  
District of Arizona  
Angela W. Woolridge  
Assistant U.S. Attorney  
Arizona State Bar No. 022079  
United States Courthouse  
405 W. Congress Street, Suite 4800  
Tucson, Arizona 85701  
Telephone: 520-620-7300  
Email: angela.woolridge@usdoj.gov  
Attorneys for Plaintiff

**CR19-01094 TUC-JGZ(JR)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

INDICTMENT

United States of America,  
  
Plaintiff,  
  
vs.  
  
Isaias Delgado;  
  
Defendant.

Violations:

18 U.S.C. §§ 922(a)(1)(A) &  
924(a)(1)(D)  
(Engaging in the Business of Dealing  
Firearms Without a License)  
Count 1

18 U.S.C. § 924(a)(1)(A)  
(False Statement in Record of Federal  
Firearms Licensee)  
Counts 2, 3, 4

18 U.S.C. § 924(d)  
Forfeiture

**THE GRAND JURY CHARGES:**

**COUNT 1**

From on or about December 17, 2018, to on or about April 4, 2019, at or near Tucson, in the District of Arizona, ISAIAS DELGADO, not being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms; in violation of Title 18, United States Code, 922(a)(1)(A) and 924(a)(1)(D).

**COUNT 2**

On or about March 20, 2019, at or near Tucson, in the District of Arizona, ISAIAS DELGADO knowingly made a false statement and representation to N&N Firearms,

1 licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to  
2 information required by the provisions of Chapter 44, Title 18, United States Code, to be  
3 kept in the records of N&N Firearms; in that ISAIAS DELGADO in connection with the  
4 purchase of firearms, that is, two Barrett model M82A1 .50 BMG caliber rifles and one  
5 Smith & Wesson model SD40 .40 S&W caliber pistol, stated that his current residence  
6 address was 1554 E. Melridge St., Tucson, AZ 85706, when in fact that was not his current  
7 residence address; in violation of Title 18, United States Code, Section 924(a)(1)(A).

8 **COUNT 3**

9 On or about March 28, 2019, at or near Tucson, in the District of Arizona, ISAIAS  
10 DELGADO knowingly made a false statement and representation to SnG Tactical – SnG  
11 Arms, doing business as Smoke & Glory, licensed under the provisions of Chapter 44, Title  
12 18, United States Code, with respect to information required by the provisions of Chapter  
13 44, Title 18, United States Code, to be kept in the records of SnG Tactical – SnG Arms; in  
14 that ISAIAS DELGADO in connection with the purchase a of firearm, that is, one  
15 Diamondback model DB-15 5.56 NATO caliber rifle, stated that his current residence  
16 address was 1554 E. Melridge St., Tucson, AZ 85706, when in fact that was not his current  
17 residence address; in violation of Title 18, United States Code, Section 924(a)(1)(A).

18 **COUNT 4**

19 On or about April 4, 2019, at or near Tucson, in the District of Arizona, ISAIAS  
20 DELGADO knowingly made a false statement and representation to N&N Firearms,  
21 licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to  
22 information required by the provisions of Chapter 44, Title 18, United States Code, to be  
23 kept in the records of N&N Firearms; in that ISAIAS DELGADO in connection with the  
24 purchase of firearms, that is, two Barrett model M82A1 .50 BMG caliber rifles, two FN  
25 model M249S .223/5.56mm caliber rifles, and one Browning model M1919 7.62 caliber  
26 rifle, stated that his current residence address was 1554 E. Melridge St., Tucson, AZ 85706,  
27 when in fact that was not his current residence address; in violation of Title 18, United  
28 States Code, Section 924(a)(1)(A).

**FORFEITURE ALLEGATION**

Upon conviction of Counts One through Four of this Indictment, the defendant, ISAIAS DELGADO, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms involved in the commission of the offenses, including, but not limited to:

1. one Barrett, model M82A1, .50 BMG caliber rifle, SN: AA008132;
2. one Barrett, model M82A1, .50 BMG caliber rifle, SN: AA008133;
3. one Smith & Wesson, model SD40, .40 caliber pistol, SN: FBH1453;
4. one Barrett, model M82A1, .50 BMG caliber rifle, SN: AA008130;
5. one Barrett, model M82A1, .50 BMG caliber rifle, SN: AA008131;
6. one FNH, model M249S, .223/5.56mm caliber belt-fed rifle, SN: M249SA05044;
7. one FNH, model M249S, .223/5.56mm caliber belt-fed rifle, SN: M249SA05168;
8. one Browning, model M1919, .308/7.62 x 51 caliber belt-fed rifle, SN: 757669;
9. one Diamondback, model DB-15, 5.56 mm rifle, SN: DB1578623;
10. one Smith & Wesson, model SD9, 9mm pistol, SN: FZY2481;
11. one Smith & Wesson, model SD9, 9mm pistol, SN: FZY2649; and
12. one Smith & Wesson, model SD40, .40 caliber pistol, SN: FZV1508.

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

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1 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States  
2 Code, Section 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

3  
4 A TRUE BILL

5 **/s/**

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7 \_\_\_\_\_  
Presiding Juror

8 ELIZABETH A. STRANGE  
9 First Assistant United States Attorney  
District of Arizona

10  
11 REDACTED FOR  
PUBLIC DISCLOSURE

12 Assistant U.S. Attorney

13 Dated: April 24, 2019  
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